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11 **Attorneys for Plaintiff**

12
13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**

15 K.A.,

16 Plaintiff,
17 v.

18 MINDGEEK S.A.R.L. a foreign entity;
19 MG FREESITES, LTD., a foreign
entity; MINDGEEK USA
20 INCORPORATED, a Delaware
corporation; MG PREMIUM LTD, a
foreign entity; MG GLOBAL
ENTERTAINMENT INC., a Delaware
corporation; 9219-1568 QUEBEC,
INC., a foreign entity; BERND
21 BERGMAIR, a foreign individual;
FERAS ANTOON, a foreign
individual; DAVID TASSILLO, a
foreign individual; VISA INC., a
Delaware corporation; REDWOOD
22 CAPITAL MANAGEMENT, LLC, a
Delaware limited liability company;
REDWOOD DOE FUNDS 1-7;
COLBECK CAPITAL
23 MANAGEMENT, LLC, a Delaware
limited liability company; COLBECK
DOE FUNDS 1-3,

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25 Defendants.
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28 David M. Stein (State Bar # 198256)
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Case No. 2:24-cv-04786-WLH-ADS

**JOINT STIPULATION TO
REQUEST SUBSTITUTION OF
REDWOOD AND COLBECK
DOE FUND DEFENDANTS IN
PLAINTIFF'S COMPLAINT**

Judge: Hon. Wesley L. Hsu

Complaint filed: June 7, 2024

Trial Date: None Set

1 Plaintiff K.A. (“Plaintiff”) and Defendants MindGeek S.à r.l., MG Freesites Ltd,
2 MindGeek USA Incorporated, MG Premium Ltd, MG Global Entertainment Inc.,
3 9219-1568 Quebec Inc., Visa Inc., Redwood Capital Management, LLC, Colbeck
4 Capital Management, LLC, Bernd Bergmair, Feras Antoon, and David Tassillo
5 (collectively, “Defendants”) (collectively with Plaintiff, the “Parties”), by and through
6 their counsel, hereby stipulate as follows:

7 WHEREAS, on May 23, 2024, in a related case—*Fleites v. MindGeek S.a.r.l.*
8 *et al.*, Case No. 21-cv-04920-WLH-ADS) (“Fleites Action”)—Plaintiff Serena Fleites
9 filed both a Motion to Amend the Caption and a Second Amended Complaint, which
10 identifies Colbeck and Redwood as new defendants (ECF Nos. 384, 385);

11 WHEREAS, after filing the Second Amended Complaint in the Fleites Action,
12 between June 7, 2024 and August 20, 2024, Plaintiff’s counsel Brown Rudnick LLP
13 also filed fourteen (14) additional actions against the same Defendants in the United
14 States District Court for the Central District of California, each of which has been
15 designated as “related” and assigned to the Honorable Wesley L. Hsu (the “Related
16 Actions”);

- 17 • *K.A. v. MindGeek S.A.R.L. et al.*, 24-cv-04786;
- 18 • *N.L. v. MindGeek S.A.R.L. et al.*, 24-cv-04788;
- 19 • *T.C. v. MindGeek S.A.R.L. et al.*, 24-cv-04795;
- 20 • *X.N. v. MindGeek S.A.R.L. et al.*, 24-cv-04800;
- 21 • *N.Y. v. MindGeek S.A.R.L. et al.*, 24-cv-04801;
- 22 • *L.T. v. MindGeek S.A.R.L. et al.*, 24-cv-04791;
- 23 • *J.C. v. MindGeek S.A.R.L. et al.*, 24-cv-04971;
- 24 • *W.L. v. MindGeek S.A.R.L. et al.*, 24-cv-04977;
- 25 • *C.S. v. MindGeek S.A.R.L. et al.*, 24-cv-04992;
- 26 • *S.O. v. MindGeek S.A.R.L. et al.*, 24-cv-04998;
- 27 • *L.S. v. MindGeek S.A.R.L. et al.*, 24-cv-05026;

- 1 • *W.P. v. MindGeek S.A.R.L. et al.*, 24-cv-05185;
- 2 • *A.K. v. MindGeek S.A.R.L. et al.*, 24-cv-05190; and
- 3 • *J.L. v. MindGeek S.A.R.L., et al.*, 24-cv-07046.

4 WHEREAS, Plaintiff in the *Fleites* Action filed the names of the Redwood Doe
5 Funds and Colbeck Doe Funds under seal at the time she filed her Second Amended
6 Complaint and Motion to Amend the Caption;

7 WHEREAS, the same Redwood Doe Funds and Colbeck Doe Funds are named
8 as defendants in the Related Actions;

9 WHEREAS, on June 18, 2024, Plaintiff in the *Fleites* Action filed a Motion to
10 Unseal the Names of the Redwood and Colbeck Fund Defendants in the Second
11 Amended Complaint (ECF No. 400, *Fleites v. MindGeek S.a.r.l. et al.*, Case No. 21-
12 cv-04920-WLH-ADS, “Motion to Unseal”);

13 WHEREAS, on July 5, 2024, the MindGeek Defendants filed a notice of non-
14 opposition to Plaintiff’s Motion to Unseal in the *Fleites* Action (ECF No. 403, *Fleites*
15 *v. MindGeek S.a.r.l. et al.*, Case No. 21-cv-04920-WLH-ADS);

16 WHEREAS, on July 9, 2024, the Court in the *Fleites* Action granted Plaintiff’s
17 Motion to Unseal (ECF No. 407, *Fleites v. MindGeek S.a.r.l. et al.*, Case No. 21-cv-
18 04920-WLH-ADS);

19 WHEREAS, *J.L. v. MindGeek S.A.R.L., et al.*, 24-cv-0704 was filed after the
20 names of the Redwood and Colbeck Fund Defendants were unsealed.

21 WHEREAS, Plaintiff seeks the following relief:

22 (1) Substitution of Defendants Redwood Doe Funds 1-7 in the caption and
23 Plaintiff’s complaint with Redwood Master Fund, Ltd; Redwood Opportunity Master
24 Fund, Ltd; Manuel 2018, LLC; Ginogerum, LLC; and White-Hathaway Opportunity
25 Fund, LLC; and

26 (2) Substitution of Defendants Colbeck Doe Funds 1-3 in the caption and
27 Plaintiff’s complaint with CB Media Ventures DD, LLC; CB Agency Services, LLC;

1 and CB Participations SPV, LLC;

2 WHEREAS, Defendants do not oppose Plaintiff's request, but the Parties agree
3 that this stipulation is without prejudice to Defendants' objections and defenses,
4 including any objection or defense based on statutes of limitations;

5 Accordingly, the Parties respectfully request that this Court enter the [Proposed]
6 Order concurrently filed with this Joint Stipulation.

7 IT IS SO STIPULATED.

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9 DATED: December 20, 2024 **BROWN RUDNICK LLP**

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By: /s/ Lauren Tabaksblat

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Michael J. Bowe

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Lauren Tabaksblat

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OLSON STEIN LLP

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By: /s/ David M. Stein

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David M. Stein

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Attorneys for Plaintiff

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1 DATED: December 20, 2024

2 **MINTZ LEVIN COHN FERRIS GLOVSKY**
3 **AND POPEO P.C.**

4 By: /s/ Esteban Morales Fabila
5 Esteban Morales Fabila
Peter A. Biagetti

6 *Attorneys for Defendants MindGeek S.à r.l.,*
7 *MG Freesites Ltd, MindGeek USA*
8 *Incorporated, MG Premium Ltd, MG*
9 *Global Entertainment Inc., and 9219-1568*
Quebec Inc.

10 DATED: December 20, 2024

11 **WEIL, GOTSHAL & MANGES LLP**

12 By: /s/ Drew Tulumello
13 Drew Tulumello
14 *Attorneys for Defendant Visa Inc.*

15 DATED: December 20, 2024

16 **MORVILLO ABRAMOWITZ GRAND**
17 **IASON & ANELLO PC**

18 By: /s/ Jonathan S. Sack
19 Jonathan S. Sack
20 *Attorneys for Defendant David Tassillo*

1 DATED: December 20, 2024

COHEN & GRESSER LLP

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By: /s/ Matthew V. Povolny

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Matthew V. Povolny

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Attorneys for Defendant Feras Antoon

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DATED: December 20, 2024

**WALDEN MACHT HARAN & WILLIAMS
LLP**

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By: /s/ Ronald G. White

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Ronald G. White

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Attorneys for Defendant Bernd Bergmair

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DATED: December 20, 2024

PAUL HASTINGS LLP

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By: /s/ James M. Pearl

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James M. Pearl

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Adam M. Reich

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Emma Lanzon

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Kiaura Clark

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*Attorneys for Defendants Redwood Capital
Management, LLC, Redwood Master Fund,
Ltd, Redwood Opportunity Master Fund,
Ltd, Manuel 2018, LLC, Ginogerum, LLC,
and White-Hathaway Opportunity Fund,
LLC*

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DATED: December 20, 2024

WHITE & CASE LLP

By: /s/ David G. Hille

David G. Hille

Kevin C. Adam

Russell J. Gould

Attorneys for Defendants Colbeck Capital Management, LLC, CB Media Ventures DD, LLC, CB Agency Services, LLC, and CB Participations SPV, LLC

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ATTESTATION STATEMENT

I, David M. Stein, the filer of this declaration, attest pursuant to Rule 5-4.3.4(a)(2) of the Local Rules for the United States District Court for the Central District of California that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

7 | Dated: December 20, 2024

OLSON STEIN LLP

/s/ David M. Stein

David M. Stein

Attorney for Plaintiff

CERTIFICATE OF SERVICE

I, the undersigned counsel of record for Plaintiff, certify that the foregoing instrument was served pursuant to the Federal Rules of Civil Procedure on December 20, 2024 upon all counsel of record via ECF.

6 | Dated: December 20, 2024

BROWN RUDNICK LLP

/s/ Lauren Tabaksblat
Lauren Tabaksblat

Attorney for Plaintiff